

From: [INFOCNTR \(PHMSA\)](#)
To: [Baker, Yul \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Letter of Interpretation Request. DOT SP 11156
Date: Wednesday, February 18, 2026 9:48:22

Good morning,

Please see the below interpretation request.

Let us know if you need anything,

Janaye

From: Matthew Spina <xplosivesolutionsllc@gmail.com>
Sent: Tuesday, February 17, 2026 4:37 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Letter of Interpretation Request. DOT SP 11156

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I have a question regarding this language in Special Permit 11156:

“PACKAGING: Packaging prescribed is a non-specification, non-reusable three-, four-, or five-wall kraft (or equivalent) paper bag with an inner barrier ply of plastic. The packaging meets all of the construction requirements applicable to a UN 5M2 bag, as stated in § 178.521, except that the stitched top closure or glued seams with sealing valve closure is not waterproof or completely sift-proof.”

If the stitch closure is not sift proof, what would be the outcome of ANFO prills sifting out during transportation? Would this lead to a violation of 173.24b? Even under the most stringent and cautious handling procedures, ANFO prills have been known to release from 5M2 bags.

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